

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HUGHES, HOOKER & CO. AND
HUGHES, HOOKER (CORRESPONDENTS) S.A.,

Plaintiffs,

-against-

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY ASSOCIATION,
INC., SHIPOWNERS CLAIMS BUREAU,
JOSEPH E. M. HUGHES, THOMAS J. MCGOWAN,
AND VINCENT J. SOLARINO,

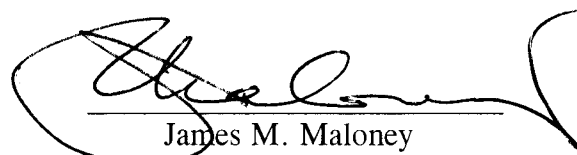
Defendants.

04 CV 1859 (SHS)

**NOTICE OF
CONDITIONAL
CROSS-MOTION**

PLEASE TAKE NOTICE that upon the Declaration of Jacek Bielecki and upon the memorandum of law submitted herewith, and upon all other papers and proceedings herein, the plaintiffs will move this Court, simultaneously with the defendants' renewed motion, for the following contingent relief: should this Court determine that "London" arbitration called for, and should it stay the proceedings pending same, that this Court first order limited discovery sufficient to enable the plaintiffs to evaluate the monetary value of their claim with greater precision than has heretofore been possible.

Dated: March 28, 2005
Port Washington, New York



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